



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

201-15526

JUL 09 2004

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Mr. Gailen A. Hart  
ExxonMobil Chemical Company  
13501 Katy Freeway  
Houston, TX 77079

Dear Mr. Hart:

Thank you for your letter dated November 19, 1999, to the U.S. Environmental Protection Agency (EPA) regarding the EPA's High Production Volume (HPV) Challenge Program. I apologize for the lengthy delay in responding to your request.

In your letter you requested the removal (or the designation of low priority) for Ketones, C12-branched (CAS No. 68514-41-0). Your letter states that Ketones, C12-branched is a byproduct of a manufacturing process and is transferred from one reactor to another, where it is consumed in the reaction process. Additionally, your letter provides information that toxicity data exist which indicates no need for additional testing.

The information you provided in your letter indicates to EPA that Ketones, C12-branched (CAS No. 68514-41-0) is not a byproduct that can be exempted under 40 CFR 710.4(d)(2) because the substance "is consumed in the reaction process." Rather, that the substance is used as a chemical intermediate in a chemical reaction and is therefore a reportable substance under the Inventory Update Rule (IUR). If ExxonMobil would like to contest this determination, EPA requests that more specific information about the manufacturing process and final disposition of the substance be provided.

As you may know, EPA posted draft guidance on procedures for removing chemicals that are no longer HPV from the scope of the voluntary HPV Challenge Program on its Chemical Right-to-Know (ChemRTK) website at [www.epa.gov/chemrtk](http://www.epa.gov/chemrtk) in March, 1999. Based on EPA's review of all the pertinent IUR data from 1998 and 2002, EPA has determined that Ketones, C12-branched (CAS No. 68514-41-0) **does not meet** the "no longer HPV" criteria.

We will post your letter, accompanied by our reply, on the ChemRTK website as soon as possible. Should you have any questions pertaining to this response, please contact Diane Sheridan at (202) 564-4770. If you have general questions concerning the HPV Challenge Program, please submit them through the ChemRTK website comment button or through the

TSCA Assistance Information Service (TSCA Hotline) at (202) 554-1404. The TSCA Hotline can also be reached via e-mail at [tsca-hotline@epa.gov](mailto:tsca-hotline@epa.gov).

Sincerely,

Wardner G. Penberthy  
Acting Director  
Chemical Control Division

cc: AR201